

**IN THE UNITED STATES DISTRICT COURT  
for the  
Eastern District of Virginia  
Newport News Division**

**UNITED STATES OF AMERICA**

**v.**

**FENGYUN SHI**

**Defendant.**

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**Case No. 4:24-mj-3**

**DEFENDANT’S MOTION TO AMEND CONDITIONS OF RELEASE**

COMES NOW, the Defendant, FENGYUN SHI, hereby submits this Motion to Amend Conditions of Release, and in support would respectfully states the followings:

1. In Order Setting Condition of Release (Dkt. No. 15), one of the release conditions for Defendant is that Defendant must reside at 419 Euille Street, Alexandria VA 22314.
2. Defendant entered a 1-month lease agreement with the homeowners of 419 Euille Street, Alexandria, VA 22314.
3. However, the homeowners of 419 Euille Street, Alexandria, VA 22314 are government employees and they feel very uncomfortable for a GPS receiver to be installed in their household.
4. Defendant found another place located at 800 John Carlyle St Apt # 538, Alexandria, VA 22314 that is okay with Defendant’s situation.
5. Defendant has entered a new lease agreement with the landlord of 800 John Carlyle St Apt # 538, Alexandria, VA 22314.
6. Further, the counsel for Defendant has communicated with the U.S. Attorney and the U.S. Probation Officer regarding this matter, they do not object that Defendant moves to the new address of 800 Carlyle St Apt # 538, Alexandria, VA 22314.

7. Therefore, Defendant respectfully requests this honorable court to grant Defendant's Motion to Amend Conditions of Release and allow Defendant change his address to 800 John Carlyle St Apt # 538, Alexandria, VA 22314.

**CONCLUSION AND PRAYER FOR RELIEF**

**WHEREFORE**, for the reasons stated in this motion and memorandum, Defendant respectfully requests this Honorable Court grant this Motion to Amend Conditions of Release. Defendant further respectfully requests that any and all other necessary and appropriated relief be granted to affect this Motion.

Respectfully submitted,

/s/ Shaoming Cheng  
By: Shaoming Cheng  
VA Bar # 80218  
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*Counsel for Defendant*

Dated: February 6, 2024

**CERTIFICATE OF SERVICE**

THIS IS TO CERTIFY that on 2/6/2024, a copy of the foregoing Defendant's Motion to Amend Conditions of Release was served via email and mail to U.S. Attorney at

Peter Osyf, Esq.  
U.S. Attorney's Office  
Eastern District of Virginia  
One City Center  
11815 Fountain Way, Suite 200  
Newport News, VA 23606  
Email: peter.osyf@usdoj.gov

/s/ Shaoming Cheng

By: Shaoming Cheng